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8 Attorneys for Defendants,
9 COUNTY OF CONTRA COSTA,
10 CONTRA COSTA COUNTY IN-HOME SUPPPORT
11 SERVICES PUBLIC AUTHORITY
12 (incorrectly sued herein as IHSS PUBLIC AUTHORITY),
13 and JOHN COTTRELL

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 GLORIA DELLAFOSSE,

Case NO. C 07 3948

17 Plaintiff,

DECLARATION OF ANDREA S. CARLISE IN
SUPPORT OF SEPARATE CASE
MANAGEMENT STATEMENT

18 vs.

19 COUNTY OF CONTRA COSTA, IHSS PUBLIC
20 AUTHORITY, JOHN COTTRELL,
21 EXECUTIVE DIRECTOR, DOES 1 to 100,

Date: February 22, 2008
Time: 10:30 a.m.
Courtroom: 7, 19th Floor
Judge: The Hon. Maxine M. Chesney

22 Defendants.

23 I, ANDREA CARLISE, declare and state as follows:

24 1. I am a partner with the law firm of Patton ♦ Wolan ♦ Carlise, LLP, attorneys of record for
25 record for defendants, COUNTY OF CONTRA COSTA, CONTRA COSTA COUNTY IN-HOME
26 SUPPORT SERVICES PUBLIC AUTHORITY, and JOHN COTTRELL, in this action.

27 2. I have personal knowledge of the matters stated herein, and if called as a witness, I would
28 and could competently testify thereto.

1 3. On the morning of February 12, 2008, I attempted to call Mr. Taylor to inform him that I
2 would be representing Defendants in this action and to seek his cooperation in drafting a joint case
3 management conference statement. His phone rang and rang with no answer, so I attempted to send him
4 an email to the address listed on the Court's docket in this action. The email was returned as
5 undeliverable, so I faxed Mr. Taylor a letter requesting that he call me regarding the Joint Case
6 Management Conference Statement. In response to this letter, Mr. Taylor's assistant called and
7 informed me of Mr. Taylor's correct email address. Mr. Taylor's assistant also stated that she would
8 relay my message to Mr. Taylor and have him return my phone call once he returned to his office on the
9 afternoon of February 13, 2008. A true and correct copy of my February 12, 2008 letter to Mr. Taylor is
10 attached hereto as Exhibit 1.

11 4. I sent Mr. Taylor an email dated February 14, 2008 in which I explained my efforts to
12 contact him and the conversation I had with his assistant. Furthermore, I informed him of the Joint Case
13 Management Conference Statement's due date of February 15, 2008 and of my intentions to email him a
14 completed draft for his review by the evening of February 14, 2008. I requested Mr. Taylor's response
15 to this email to confirm that he would be reviewing and editing the draft by noon on February 15, 2008.
16 Mr. Taylor has not responded to this email. A true and correct copy of the email dated February 14,
17 2008 is attached hereto as Exhibit 2.

18 5. I sent Mr. Taylor a second email on February 14, 2008 with a draft of the Joint Case
19 Management Statement. I requested that Mr. Taylor edit the draft, make proposed changes and return it
20 to me by email no later than noon of February 15, 2008. I also informed him of my intentions to revise
21 the Joint Case Management Conference Statement to make it a Separate Case Management Conference
22 Statement and to advise the court that he failed to respond if he did not reply back with his changes. A
23 true and correct copy of the email dated February 14, 2008 is attached hereto as Exhibit 3.

24 6. Mr. Taylor had not responded to my emails by noon today, so I asked my assistant to call
25 him. When she was unable to reach anyone by telephone, she sent him another email which was blind
26 copied to me. Mr. Taylor never responded to this email either. A true and correct copy of the email sent
27 by my assistant to Mr. Taylor and blind copied to me dated February 15, 2008 is attached hereto as
28 Exhibit 4.

7. Since I was unable to communicate with Plaintiff's counsel about the contents of the joint case management statement, Defendants are filing a separate case management statement.

Executed this 15th day of February, 2008 at Oakland, California.

Andrew J. Carlson

ANDREA S. CARLISE